



U.S. Department of Education
Office of Inspector General



U.S. Department of Labor
Office of Inspector General

An OIG Perspective on the Sustainability of State School-to-Work Systems



May 1999

ED-OIG Control Number S07-90001
DOL-OIG Report Number 05-99-012-03-385

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EXECUTIVE SUMMARY

As the authority for the School-to-Work Opportunities Act (STWOA) ends on October 1, 2001, it is important to assure that the States are developing sustainable School-to-Work (STW) systems. This report summarizes findings from four recent U.S. Departments of Education and Labor, Offices of Inspectors General (OIG) audits that focused on the sustainability of State STW systems. It also offers recommendations based on these findings and discussions with the National School-to-Work Office (NSTWO). The recommendations are intended to assist the NSTWO in helping States develop STW systems that will be sustained after Federal program funding ceases.

Why STWOA was Enacted - The STWOA was enacted to provide seed capital to States and localities for developing and implementing comprehensive STW systems. The purpose of these systems is to bring together efforts on education reform, worker preparation, and economic development to prepare youth for high-skill, high-wage careers, and to increase their opportunities for further education and training. The Federal Government will have invested approximately \$2 billion in the creation of statewide STW systems by the time the STWOA sunsets.

How OIGs Planned the Audits - We met with NSTWO officials in April 1997 to plan our audit work. We decided to focus on the issue of sustainability and identified elements that we believed to be indicative of a sustainable STW system. We conducted audits and issued final audit reports on State STW systems in Maryland, Iowa, New Mexico, and Missouri.

Results of Audit - Although some of the States that we audited were early in their 5-year STW Implementation Grants, we found that the States had taken measures that would contribute to system sustainability. We also found areas in which actions could be taken by the States to increase the likelihood that their STW systems will be sustained after Federal funding ceases. To assist the NSTWO in developing sustainable STW systems, we recommend that the NSTWO take the following measures to support the development of sustainable STW systems:

- NSTWO should monitor and provide additional technical assistance to States to ensure that they are developing STW systems that will be sustainable after Federal funding ceases. Technical assistance should focus on areas identified as “System Weaknesses” in this report.
- NSTWO should base continuation funding decisions on the progress States are making in

fulfilling their STW plans. These funding decisions should take into special consideration the aspects of State plans that relate to the elements of sustainability. Continuation funds should be withheld until plan conditions are met.

In addition, we recommend that the Assistant Secretary for Vocational and Adult Education work with the Assistant Secretary for Elementary and Secondary Education to consider STW implications during deliberations with Congress on reauthorization of the Elementary and Secondary Education Act.

Additional Concerns - The States we reviewed, and all of the other States funded prior to 1998, applied on their own initiative and actively competed with other States to receive STW Implementation Grants. However, in September 1998, the remaining 13 States, the District of Columbia, and Puerto Rico were funded on a non-competitive basis. Moreover, these entities were able to develop acceptable applications only with intensive encouragement and assistance by NSTWO staff. In our opinion, these late-funded States may need considerable special attention for them to have any hope of developing systems that will continue after the program sunsets on October 1, 2001.

INTRODUCTION

Purpose and Objective

This report summarizes findings from recent OIG audits of State STW systems funded under the STWOA. It also offers recommendations based on these findings and discussions with NSTWO. The objective of this report and the recommendations herein are to assist the NSTWO in helping States develop sustainable STW systems, when Federal program funding ceases.

Since the U.S. Departments of Education and Labor (ED and DOL) jointly administer the School-to-Work Opportunities Act, the OIGs of both agencies conducted the audits. DOL's OIG conducted audits of the State STW systems in Maryland and Iowa, and ED's OIG conducted audits of the State STW systems in New Mexico and Missouri. The four audits were conducted between June 1997 and July 1998.

Background

STW is a relatively new approach to learning for all students, including "college bound" students as well as those preparing for more immediate employment. It is based on the concept that education works best and is most useful for future careers when students apply what they learn to real work situations. Many young people leave school unequipped with skills they need to perform the jobs of a modern, competitive world economy. In addition, employers are having difficulty finding workers who are adequately prepared for today's more demanding jobs.

The Secretary of Labor and the Secretary of Education jointly administer STWOA in a flexible manner to promote State and local discretion in establishing and implementing statewide STW systems. The NSTWO acts on behalf of the Secretaries of Education and Labor in administering the STWOA. Congress appropriates STWOA funding for both agencies, but each of the grants for States and localities is awarded by one or the other agency. The Administration has requested \$110 million for STWOA in its fiscal year 2000 budget. The authority provided by STWOA will terminate October 1, 2001.

The purpose of the STWOA is to provide seed capital to States and localities for developing and implementing comprehensive STW systems. These systems are designed to provide students with the academic and occupational skills necessary to prepare them for first jobs in high-skill, high-wage careers, and to increase their opportunities for further education and training. Every State and locally created STW system must contain the following core elements:

- School-based learning - classroom instruction and curriculum that integrates academic and technical learning and incorporates career awareness, career exploration, and counseling programs;
- Work-based learning - work experience, structured training and mentoring at job sites; and
- Connecting activities - courses integrating classroom and on-the-job instruction, matching students with participating employers, training of mentors and the building of other bridges between school and work.

While STW may look different from State to State, it is intended that each local system provides relevant education, marketable skills, and valued credentials to all its learners.

Scope and Methodology

In April 1997, officials from ED OIG, DOL OIG, and NSTWO met to formulate an audit plan that would result in providing added value to NSTWO's current program management strategy. NSTWO officials expressed concern about the ability of States to continue their STW initiatives after the expiration of their Federal STW grants. For this reason, the discussion focused on the issue of sustainability and resulted in the identification of elements the group believed to be indicative of a sustainable STW system. Audits would be conducted of selected States in order to determine whether they had institutionalized these elements in their STW systems.

The elements that were identified as indicative of a sustainable STW system are embraced by Section 213(d) of STWOA, which specifies what must be included in State implementation plans. These elements are:

- (1) Legislation/Policies
- (2) Governance (e.g., organizational distance from the governor, administrative structure, organizational flow)
- (3) Performance Indicators/Strategic Plans
- (4) Incorporation of Other Programs
- (5) Leveraged Funds
- (6) Involvement of Stakeholders (e.g., students, employers, schools, parents, trade associations, unions, professional associations, K-16 school levels), including:

- (a) Incentive/Reward Structure
 - (b) Certification of Teachers/Guidance Counselors
 - (c) Skill Certificates/Portable Credentials
 - (d) Public Message/Outreach
- (7) System Roll-Out to Regional and Local Partnerships

To accomplish our objective of assisting the NSTWO in helping States develop sustainable STW systems, we reviewed applicable Federal legislation as well as studies and reports pertaining to STW. We selected the States to be audited based on discussions with NSTWO officials and a review of documentation at their office in Washington, D.C. In each of the four States selected, we reviewed pertinent documents and interviewed key personnel from various State offices and regional and local partnerships. The audits were conducted in accordance with Government Auditing Standards appropriate to the scope of the review described above. The results of these audits, which covered the period February 25, 1994 through May 29, 1998, are discussed in this report.

RESULTS

In each of the four States we audited, we found that officials had taken measures that would contribute to the sustainability of their STW systems. This was true even in those States that were early in their STW Implementation Grant performance periods. We also found, in each State reviewed, areas in which actions could be taken to increase the likelihood that its STW system would be sustained after Federal funding ceases.

System Strengths

Maryland's experience with STW is noteworthy because a number of key components had been under development in the State for many years prior to receiving Federal STW funding. Two important components of the State's current school reform effort, which began in 1989, have been the development of a comprehensive, data-driven school accountability system and the integration of academic and vocational education at the secondary and post-secondary levels. In 1994, the State initiated a Career Development Model through which students can identify and assess career interests and goals in order to select career-focused programs of study. Maryland also established, with its STW Implementation Grant, Employer Incentive Funds at the State and regional levels. Through an employer matching requirement, these Funds provide monetary incentives to encourage employers to expand work-based learning opportunities for students and to involve employers in revising curricula and educating teachers about their expectations for high school graduates.

By developing a statewide career education program prior to receiving its State Implementation Grant, New Mexico, like Maryland, had taken an important step in establishing a comprehensive State-level STW system. In addition, its placement of the position of STW Coordinator in the Governor's Office appears to have encouraged a level of partnership and team work among key State agencies that may otherwise have been difficult to achieve. Finally, STW sustainability was probably enhanced by decisions made by State officials that extended the benefits of STW to include students in non-public as well as public schools.

Iowa has an active interdepartmental School-to-Work Administrative Team that is comprised of two Iowa STW Co-Directors as well as two officials each from Iowa Workforce Development, the Department of Economic Development, Department of Education, and the Association of Business and Industry (ABI). Iowa officials know that the STW system's success is dependent on the willingness of employers to invest in changing the system, including the provision of work-based learning opportunities. These officials encouraged the Iowa ABI to undertake the

responsibility for identifying necessary skills within Career Pathways. ABI has verified a set of 13 competencies which blend academic and technical proficiencies and has performed surveys concerning the level of knowledge and interest of employers in Iowa regarding the STW initiative.

Missouri emphasizes career planning and exploration for all students at all grades through its Comprehensive Guidance Program. In addition, the State has enacted the Outstanding Schools Act of 1993, which supports educational reform and workforce development. Schools are designed to enable students to gain a solid foundation of traditional academic knowledge and skills, and to prepare students for life after school, for higher education, citizenship, and productive employment.

System Weaknesses

In summarizing the significant weaknesses identified in the four audits, we found areas where action could be taken that relate to all of the sustainability elements, except “Incorporation of Other Programs.” (See Exhibit A) In several areas, States had similar weaknesses, as described in the following paragraphs.

- ***Leveraged Funds.*** Three of the four States did not have a system for leveraging funds when Federal funding ceases (Maryland, Missouri, New Mexico). State implementation plans are required to address the issue of leveraging funds from sources other than the Federal STW Program. Although the plans submitted by the States addressed this issue, they discussed it only in terms of the grant period itself. Our concern is that the States are not developing plans for what is needed once Federal STW funding ceases.
- ***Skill Standards/Portable Credentials.*** Two of the four States were not providing direction for the development of skill standards or portable credentials (Missouri, New Mexico). States are required, in their applications for implementation funding, to describe the processes they will use to assess the skills and knowledge required in career majors. They are also required to describe their processes for awarding skill certificates that are, to the extent feasible, consistent with the skills standards certification systems endorsed under the National Skill Standards Act of 1994. In these two States, it was left up to each local partnership to develop its own standards and credentials with little or no direction provided by State agencies.
- ***Certification of Teachers/Guidance Counselors.*** All four States had not established policies and procedures that will ensure that teachers, counselors, and administrators are prepared to deliver STW services to all students (Iowa, Maryland, Missouri, New Mexico). Staff development and certification related to STW activities are important to the success of the STW system. The 1997 Report to Congress on Implementation of the STW Opportunities Act reports, “*States and local partnerships recognize that staff development is an investment*

that will lead to long-term changes in teaching and developing a future workforce.” The report also mentions that “ . . . pre-service and in-service training and credentialing of teachers, which are considered critical to increasing teacher understanding and practice of STW methodologies, are not yet a major focus.” In our opinion, all States should include STW training in their programs for the development and certification of educators.

- ***Public Message Outreach.*** Three of the four States are not focusing enough effort on encouraging businesses to participate in regional and local partnerships (Maryland, Missouri, New Mexico). Employers are critical stakeholders in any STW system. In one State, we learned that many businesses have a “wait and see” attitude about STW and may not be willing to commit the effort at this time. Another State focused STW marketing efforts on corporations, employer associations, and membership groups but not individual employers. The State had not explored the strategy of obtaining employers’ mailing addresses to inform them about the STW system and how they could participate. The third State had not fully developed the management team that was to be in charge of getting employer involvement, even though its implementation grant was in the middle of its second year.
- ***Performance Indicators/Strategic Plans.*** Three of the four States have not developed a strategic plan and/or performance indicators to support the development of a sustainable STW system (Iowa, Missouri, New Mexico). It is our view that a comprehensive, strategic plan is needed to develop and sustain statewide systems such as the one envisioned in the STW legislation. One State had developed performance measures, but did not have a mechanism in place to ensure the collection of consistent statewide STW data. In a second State, an independent report that reviewed the State’s workforce programs and policies noted that the State should consider developing: (1) a statewide strategic plan that includes a coordinated system of services and (2) a performance management system with State benchmarks, outcomes or performance measures, and accountability. In another State, the State education agency had never developed a strategic plan, even though local education agencies in the State had been required for 12 years to follow well-defined strategic planning procedures.

Individual Report Recommendations

To support the development of sustainable statewide STW systems, we made the following recommendations with respect to one or more of the States we audited:

- Consider developing specific STW legislation or policies that would help to ensure the development of a statewide STW system;
- Develop performance indicators to measure the effectiveness of the STW system;
- Take a larger leadership role in the development of the statewide skill credentialing

process;

- Establish policies and procedures that will ensure that K-12 teachers, counselors, and administrators are prepared to deliver STW services to all students;
- Incorporate STW in State strategic planning processes to ensure the sustainability of the STW system;
- Establish formal plans for leveraging funds from other sources when Federal funding ceases;
- Involve all stakeholders, especially the business community, teachers, and counselors in the development of the statewide STW system;
- Establish monitoring, evaluation, and technical assistance policies and procedures that will ensure the effectiveness of the regional and local STW partnerships;
- Ensure that all management teams assigned to assist in developing the STW system are operational; and
- Emphasize STW concepts within the organizational function statements and position descriptions of the State Education Agency (SEA).

PROGRAM IMPLICATIONS

Improvements Will Be Needed to Institutionalize State STW Systems

NSTWO's September 1997 Report to Congress noted the following with regard to those States that had been awarded Implementation grants: “. . . *not all States have the long-term planning or a clear strategy to identify and commit the resources that will be necessary to sustain STW activities. Site visits also show that several States have lost momentum in their efforts due to changes in leadership or State priorities.*”

Our audit of four States that have been in the program for less than 3 years indicated there are a number of improvements needed for these States to develop a sustainable STW system. We believe these States will need at least the 5 years of their grant periods to develop statewide STW systems. Some may need more.

For example, in Missouri, there is strong opposition to both State and Federal requirements

affecting schools. Therefore, Missouri has not implemented any specific STW legislation or policies. The approach Missouri has taken is to award grants to regional and local partnerships to implement STW in their respective areas in the hope that the success of these partnerships will eventually lead to a statewide STW system. Missouri is not the only State to face opposition to STW. In such States, it may take more than the 5-year grant period to create a sustainable STW system.

Thirteen States, the District of Columbia and Puerto Rico May Not Have Time to Build Sustainable STW Systems

States awarded implementation grants during the 1994-96 period had 5 years to carry out funded activities. However, the remaining 13 States, the District of Columbia, and Puerto Rico, which were awarded grants in September 1998, have only 4 years for implementation, due to the “sunset” provision that terminates authority for the Federal STW program in 2001. In spite of the shortened, 4-year implementation period, these States were still given 5 years worth of funding. Since these States had been unable to write an approved application during the early years of STW funding, they may not be as prepared as were the other States to build sustainable systems. The process for awarding grants to these late-funded States differed dramatically from that used for the other States. The States funded in 1994-96 applied on their own initiative and were awarded grants on a competitive basis. The last 13 States, the District of Columbia, and Puerto Rico were funded on a non-competitive basis and were able to develop acceptable applications only with intensive encouragement and assistance by NSTWO staff. In our opinion, these late-funded States may need considerable special attention for them to have any hope of developing systems that will survive after their Federal funding terminates in just 4 years.

According to an NSTWO official, an annual review is conducted before a grant is “modified” or “continued” with the award of new funds. A State must show how past funds were spent and submit a plan for spending the following year’s funds -- in the case of grants that originated in ED, there must be a 5-year plan. The State must show that its development of the STW system is progressing in accordance with STWOA and the State’s STW plan. Until these conditions are met, continuation funding should be withheld.

Implication for Reauthorization of the Elementary and Secondary Education Act

The School-to-Work Opportunities Act was a major Federal effort to bridge the gap between K-12 education, postsecondary education, and the workplace. Before this important legislation sunsets in 2001, Elementary and Secondary Education Act (ESEA) programs will be up for reauthorization by Congress. By this time the Federal Government will have invested about \$2 billion in the creation of statewide STW systems. In the process, relationships will have been developed among education, labor, and economic development organizations at the State,

regional, and local levels. Partnerships will have been developed between schools and employers. Teachers, counselors, and other school personnel will have been trained in new skills to teach and otherwise orient students to their future careers.

The Department of Education should consider STW implications for elementary and secondary education programs and activities in its deliberations with Congress on ESEA reauthorization.

RECOMMENDATIONS

Based on the findings and conclusions listed above, we recommend that the NSTWO take the following measures to support the development of sustainable STW systems:

1. NSTWO should monitor and provide additional technical assistance to States to ensure that they are developing STW systems that will be sustainable after Federal funding ceases. Technical assistance should focus on areas identified above under “System Weaknesses.”
2. NSTWO should base continuation funding decisions on the progress States are making in fulfilling their STW plans. These funding decisions should take into special consideration the aspects of State plans that relate to the elements of sustainability. Continuation funds should be withheld until plan conditions are met.

In addition, we recommend that the Assistant Secretary for Vocational and Adult Education work with the Assistant Secretary for Elementary and Secondary Education to consider STW implications during deliberations with Congress on reauthorization of ESEA.

Findings from Audits of State STW Sustainability

Sustainability Elements	Maryland	Iowa	New Mexico	Missouri
Legislation/Policies	None	None	None	State legislation or policy directives would help ensure the development of a statewide STW system.
Governance/Organization	The organizational function statements and position descriptions of the SEA, which is the lead STW agency, did not emphasize STW.	None	A permanent leadership authority for the statewide STW system has not been established.	Key state-level STW teams need to be fully staffed to effectively and efficiently manage the day-to-day operations of the STW system.
Performance Indicators/ Strategic Plans	None	Iowa does not have a standardized process for statewide collection of STW-related data.	The SEA and the State Board of Education have not developed comprehensive strategic plans for their leadership of statewide education reform.	The STW Management Team has not developed a strategic plan or performance indicators to support the development of a sustainable STW system.
Incorporation of Other Programs	None	None	None	None
Leveraged Funds	No plans have been developed for continued funding for the collection of performance measure data and the Employer Incentive Funds.	None	State appropriations may need to be increased to fully develop and maintain a statewide STW system.	No plans have been developed to fund the STW system after Federal funding ceases.

Sustainability Elements	Maryland	Iowa	New Mexico	Missouri
Involvement of Stakeholders				
■ Incentive/ Reward Structure	Students are not required to participate in STW activities as a graduation requirement.	Students are not required to participate in STW activities as a graduation requirement.	None	None
■ Certification of Teachers/ Guidance Counselors	State certification requirements for teachers and guidance counselors lack mandatory STW training.	State certification requirements for teachers and guidance counselors lack mandatory STW training.	The State Board of Education has not established policies and procedures that will ensure that teachers, counselors, and administrators are prepared to deliver STW services to all students.	The State Board of Education has not established policies and procedures that will ensure that teachers, counselors, and administrators are prepared to deliver STW services to all students.
■ Skill Standards/ Portable Credentials	Skill standards and portable credentials are not finalized.	None	Neither the NM Department of Labor or the NM Department of Education were taking steps to build a statewide credentialing system.	State agencies are not providing direction for the development of skill standards and portable credentials.
■ Public Message/ Outreach	The overall STW marketing strategy is not firmly targeted towards employers.	None	Efforts need to be focused on encouraging small businesses to participate in regional and local partnerships.	Efforts need to be focused on encouraging businesses to participate in regional and local partnerships.
System Roll-Out to Regional and Local Partnerships	None	None	<p>Policies and procedures for monitoring, evaluating, and providing technical assistance to regional and local partnerships have not been developed.</p> <p>Efforts need to be focused on developing regional and local partnerships in rural school districts.</p>	<p>Policies and procedures for monitoring, evaluating, and providing technical assistance to regional and local partnerships have not been developed.</p>

Exhibit B

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